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ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco
03/24/2025
Clerk of the Court
BY: SAHAR ENAYATI
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO-UNLIMITED JURISDICTION

JAZZEIA EDWARDS, Plaintiff, vs. CARITAS MANAGEMENT CORPORATION, DOES 1-10 INCLUSIVE Defendant	Case No. **CGC-25-623537** **COMPLAINT FOR:** **(1) BATTERY** **(2) ASSUALT** **(3) NEGLIGENCE** **[UNLIMITED CIVIL CASE – AMOUNT DEMANDED EXCEEDS $25,000]** **JURY TRIAL DEMANDED**

Plaintiff Jazzeia Edwards states this complaint against the defendants as follows:

PARTIES

1. Plaintiff is a small female individual that at all times relevant in this complaint resided in the County of San Francisco, California.

2. Defendant Caritas Management Corporation is and at all times relevant to this complaint was a resident of the County of San Francisco, California.

3. Plaintiff is ignorant of the true names and capacities of defendants sued in this complaint as DOES 1-10 inclusive, and therefore sues these defendants by those fictitious names.

4. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and on that basis alleges that each of the fictitiously named defendants is responsible in some manner for the occurrences alleged in this complaint, and alleges that Plaintiff's injuries as alleged in this complaint were caused by Defendants' conduct.

FACTUAL ALLEGATIONS

5. On or about the evening of March 2, 2024, Plaintiff left her former home located at 1064 Mission Street, Unit #429, San Francisco, CA 94103 ("Premises") for an evening out with a friend.

6. Later, in the early morning of March 3, 2024, Plaintiff returned to the Premises with the friend. The friend had left personal property in the Premises, and Plaintiff was attempting to return the personal property to the friend so the friend could travel home.

7. The Premises, were and Plaintiff is informed and believes, still are managed by Defendant Caritas Management Corporation ("Caritas.") In the alternative, Plaintiff is informed and believes Defendant Caritas owned the Premises.

8. Plaintiff is informed and believes Caritas employed a large adult male agent to keep a guest book ("Doe Defendant 1.")

9. At around 3:13 am, Plaintiff and her friend attempted to leave the building, but were prevented from doing so by Doe Defendant 1.

10. Doe Defendant 1 blocked Plaintiff's exit by standing in the doorway, spreading his chest, pointing his finger in Plaintiff's face, verbally berating Plaintiff, fainting at Plaintiff with punches, and charging in Plaintiff's direction.

11. Doe Defendant 1's conduct was so threatening a security guard rushed to place himself between Doe Defendant 1 and Plaintiff and Plaintiff's friend. Plaintiff is informed and believes the security guard was also employed by Caritas and hereafter identifies the security guard as Doe Defendant 2.

12. At around 3:14 AM, Doe Defendant 1 shoved Plaintiff hard in the chest and backed Plaintiff into a corner where he towered over her. At or around 3:14 am, Doe Defendant 1 lunged over the security guard and punched Plaintiff in the head.

13. Doe Defendant 1 thereafter cornered Plaintiff's friend within the building and prevented the friend from leaving by striking her and physically menacing her.

14. Plaintiff, seeking to protect her friend, drew Doe Defendant 1's attention away from the friend and lured Doe Defendant 1 into the entrance hallway.

15. Plaintiff then entered an office area where she gathered her friend away from Doe Defendant 1, and attempted to flee the building through the office.

16. Doe Defendant 1 pursued Plaintiff into the office and trapped her within the confined space.

17. At or around 3:18 am, Doe Defendant 1 struck Plaintiff in the head with his right elbow.

18. Doe Defendant 2 then rushed to grab and restrain Plaintiff rather than seeking to restrain Doe Defendant 1.

19. Whilst Plaintiff was restrained by Doe Defendant 2, Doe Defendant 1 grabbed Plaintiff by her hair and pulled her from Doe Defendant 2's arms. Doe Defendant 1 then threw Plaintiff to the ground.

20. At or around 3:18 am, Doe Defendant 1 foot stomped Plaintiff's face and then proceeded with kicking Plaintiff's midsection. Doe Defendant 1 then began to swing punches wildly into Plaintiff's person.

21. Doe Defendant 2 stood above Plaintiff while she was being beaten by Doe Defendant 1.

22. Plaintiff crawled away from the blows of Doe Defendant 1 after he became exhausted.

23. At or around 3:20 am, Plaintiff's guest Clarissa Lockett attempted to revive Plaintiff and usher her away from Doe Defendant 1.

24. Doe Defendant 1 spotted Ms. Lockett and became irate. Doe Defendant 1 then tackled Ms. Lockett to the ground while striking her with punches, elbows, knees, and kicks.

25. Once more, Doe Defendant 2 stood above Ms. Lockett whilst she was being stuck by Doe Defendant 1.

26. Plaintiff is informed and believes an agent or agents of Defendant Caritas then falsely reported to the San Francisco Police Department that Plaintiff had attacked Doe Defendant 1. Because of the lies of Defendant's agents, Plaintiff was arrested, prevented from receiving immediate medical care, and lost cash that was on her person.

27. Plaintiff never consented to any of the physical contact or belligerent conduct of Defendants' agents.

28. Doe Defendant 1 was acting within the scope of his employment with Defendant Caritas for all acts described herein.

29. Doe Defendant 2 was acting within the scope of his employment with Defendant Caritas for all acts described herein.

30. Plaintiff is informed and believes she suffered a concussion or other brain injury due to the strikes she received from Doe Defendant 1.

31. Plaintiff is informed and believes she received bruised or broken ribs as a result of the attack by Doe Defendant 1. Plaintiff did receive other bruises and lacerations.

32. Plaintiff has been severely emotionally and psychologically harmed by the attack on March 3, 2024.

33. Plaintiff now seeks just compensation by bringing claims for battery, assault, and negligence against Defendants.

FIRST CAUSE OF ACTION

(BATTERY-DEFENDANT CARITAS AND DOE DEFENDANT 1)

34. Plaintiff realleges and incorporates by reference all previous allegations.

35. Doe Defendant 1 touched Plaintiff with the intent to harm and offend Plaintiff.

36. Plaintiff did not consent to the touching of Doe Defendant 1.

37. Plaintiff was harmed and offended by Doe Defendant 1's conduct.

38. A reasonable person in Plaintiff's situation would have been offended by the touching.

39. Doe Defendant 1 was acting within the scope of his employment with Defendant Caritas and therefore Defendant Caritas is liable for the conduct of Doe Defendant 1 under the doctrine of respondeat superior.

40. Plaintiff has suffered physical and emotional harm proximately caused by the conduct of Defendants.

41. Defendants' conduct was malicious, oppressive, and despicable justifying the award of punitive damages.

SECOND CAUSE OF ACTION

(ASSAULT-DEFENDANT CARITAS AND DOE DEFENDANT 1)

42. Plaintiff realleges and incorporates by reference all previous allegations.

43. Doe Defendant 1 acted, intending to cause harmful and offensive contact to Plaintiff.

44. Plaintiff reasonably believed that she was about to be touched in a harmful manner and Doe Defendant 1.

45. Doe Defendant 1 threatened to touch Plaintiff in a harmful manner and it reasonably appeared to Plaintiff that Doe Defendant 1 was about to carry out the threat.

46. Plaintiff did not consent to Doe Defendant 1's conduct.

47. Plaintiff has suffered physical and emotional harm proximately caused by the conduct of Defendants.

48. Doe Defendant 1 was acting within the scope of his employment with Defendant Caritas and therefore Defendant Caritas is liable for the conduct of Doe Defendant 1 under the doctrine of respondeat superior.

49. Defendants' conduct was malicious, oppressive, and despicable justifying the award of punitive damages.

THIRD CAUSE OF ACTION

(NEGLIGENCE-ALL DEFENDANTS)

50. Plaintiff realleges and incorporates by reference all previous allegations.

51. Each Defendant owed Plaintiff a duty of reasonable care not to cause foreseeable harm.

52. Defendants owed Plaintiff a duty of reasonable care to truthfully report the events of March 3, 2024 to the San Francisco Police Department.

53. Defendant Caritas owed Plaintiff a duty of reasonable care to not employ foreseeably violent desk agents such as Doe Defendant 1.

54. Doe Defendant 1 owed Plaintiff a duty of reasonable care not to physically attack her.

55. Doe Defendant 2 owed Plaintiff a duty of reasonable care not to restrain Plaintiff whilst she was being attacked by Doe Defendant 1.

56. Doe Defendant 2 owed Plaintiff a duty of reasonable care not to prevent her from fleeing the attacks of Doe Defendant 1.

57. Defendants breached their duty of reasonable care by untruthfully reporting the events of March 3, 2024 to the San Francisco Police Department, which proximately caused Plaintiff to be wrongfully detained and prevented from receiving immediate medical care.

58. Defendant Caritas breached its duty of care to Plaintiff by employing the foreseeably violent front desk agent on March 3, 2024.

59. Doe Defendant 1 breached its duty of reasonable care to Plaintiff by physically attacking her on March 3, 2024.

60. Doe Defendant 2 breached his duty of reasonable care by restraining Plaintiff whilst she was being attacked by Doe Defendant 1.

61. Doe Defendant 2 breached his duty of reasonable care by preventing Plaintiff from fleeing the attacks of Doe Defendant 1.

62. Doe Defendants 1 and 2 were acting within the scope of their employment with Defendant Caritas and therefore Defendant Caritas is liable for the conduct of Doe Defendant 1 under the doctrine of respondeat superior.

63. Plaintiff has suffered physical and emotional harm proximately caused by the conduct of Defendants.

PRAYER FOR RELIEF

WHERFORE, Plaintiff requests that judgment be entered in its favor and against Defendants as follows:

1. For general damages of $1,000,000.00;

2. For punitive damages in an amount to be determined at trial;

3. For prejudgment interests;

4. For costs.

Dated: February 24, 2025

Kavin Williams

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Attorney for Plaintiff Jazzeia Edwards